

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SETH VILLAFAN, a single man; WOLFGANG  
OLSON, a single man; and JOSH GRAVES, a  
married but separated man,

Plaintiffs,

v.

NORTHWEST MOTORSPORT, LLC, a  
Washington limited liability company; HILT  
VENTURE CAP INC., a Washington limited  
liability company; DONALD FLEMING and  
JANE DOE FLEMING, residents of Montana,  
and the marital community composed  
thereof; NORTHWEST MOTORSPORT, INC.,  
a Washington corporation; RICHARD FORD  
and JANE DOE FORD, residents of Texas,  
and the marital community composed  
thereof; RFJ AUTO PARTNERS NORTHERN  
HOLDINGS, INC., a Delaware corporation;  
JOHN and JANE DOES 1-5 and the marital  
communities composed thereof; and RFJ  
AUTO GROUP, INC., a foreign corporation,

Defendants.

NO. 2:20-cv-01616 TSZ

**STIPULATED MOTION AND ORDER  
FOR EXTENSION OF DEADLINE  
FOR FILING MOTIONS RELATED  
TO CLASS CERTIFICATION**

**CLERK'S ACTION REQUIRED**

**NOTE ON MOTION CALENDAR:  
WEDNESDAY, NOVEMBER 15, 2022**

**STIPULATED MOTION AND ORDER FOR  
EXTENSION OF DEADLINE FOR FILING MOTIONS  
RELATED TO CLASS CERTIFICATION - 1**  
No. 2:20-cv-01616 TSZ

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**I. STIPULATED REQUESTED RELIEF**

Pursuant to LCR 7(j) and LCR 10(g), the parties to this action, hereby stipulate and jointly request relief regarding the deadline for filing motions related to class certification.

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Deadline for filing motions related to class certification	November 17, 2022	December 1, 2022

The parties agree that the current deadline for filing a motion for class certification should be extended to December 1, 2022. Good cause exists for this extension of time given the scheduling conflicts of experts whose participation in the preparation of the motion is essential. One such expert also continues to recover from Covid. The parties agree that the current deadline for filing motions related to class certification should be extended to Thursday, December 1, 2022.

Based on the foregoing, counsel for the parties has conferred and agreed that an extension of the deadline for filing motions related to class certification is warranted. The parties hereby stipulate to the proposed extension.

IT IS SO STIPULATED, and a proposed order consistent with LCR 10(g) is attached herewith. The parties respectfully request entry of the subjoined order.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

1 DATED this 15<sup>th</sup> day of November, 2022.

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10 *Attorney for Plaintiffs*

DATED this 15<sup>th</sup> day of November, 2022.

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*Attorneys for Defendants*

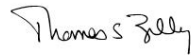
**ORDER**

This matter, having come before the Court on the above-stipulated motion, IT IS  
SO ORDERED THAT:

1. Relief is granted to extend the following deadline:

<b>Event</b>	<b>Current Deadline</b>	<b>New Deadline</b>
Deadline for filing motions related to class certification	November 17, 2022	December 1, 2022

Dated this 17th day of November, 2022.




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THE HONORABLE THOMAS S. ZILLY

**DECLARATION OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of November, 2022, I caused the foregoing document to be filed with the Clerk of the Court via the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following persons:

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Attorneys for Defendants Northwest  
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Inc., Donald Fleming, Richard Ford, RFJ  
Auto Partners Northern Holdings, Inc., RFJ  
Auto Group, Inc.

I affirm under the laws of the State of Washington and the United States that the foregoing is true and correct to the best of my knowledge.

DATED this 15<sup>th</sup> day of November, 2022, at Edmonds, WA.

**LAW OFFICES OF EUGENE N. BOLIN, JR., P.S.**

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